

**BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001**

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**MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012**

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**Docket No. N2012-1**

**RESPONSE OF AMERICAN POSTAL WORKERS UNION, AFL-CIO, WITNESS  
MARC SCHILLER TO UNITED STATES POSTAL SERVICE  
INTERROGATORY USPS/APWU-RT2-25  
(June 8, 2012)**

The American Postal Workers Union, AFL-CIO, hereby files the response of APWU witness Marc Schiller (APWU-RT-2) to the above-listed interrogatory of the United States Postal Service dated May 29, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,  
Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

**RESPONSE OF AMERICAN POSTAL WORKERS UNION, AFL-CIO WITNESS  
SCHILLERTO UNITED STATES POSTAL SERVICE INTERROGATORY**

**USPS/APWU-RT2-25.** Please refer to your responses to interrogatories USPS/APWU-RT2-3 and 4(h), in which you indicate, respectively, that no contract between Shorter Cycles and Decision/Analysis Partners relating to the modeling effort exists, and that when asked for “all contracts” relating to work on the In Depth Interviews you responded “N/A.”

- a. Please provide a copy of Shorter Cycles contract with APWU.
- b. Please confirm that your understanding is that no contract is involved in the work Decision/Analysis Partners performed when working with Shorter Cycles, not even one that Decision/Analysis Partners might have with APWU.
  - i. If confirmed, please provide your understanding of why Shorter Cycles had no reason to pay Decision/Analysis Partners for its professional services, why it would not be compensated for its work, and whether professional work provided for free is of a type reasonably relied upon by an expert in your field.
  - ii. If not confirmed, please explain your full understanding and provide a copy of any contract under which Decision/Analysis Partners worked (redirecting the latter part of this question if appropriate).

**RESPONSE:**

- (a) Objection filed.
- (b) Not confirmed.
  - (i) N/A
  - (ii) Objection filed.